

WILSON, ELSER, MOSKOWITZ
EDELMAN & DICKER, LLP
Attorneys for County Defendants
1133 Westchester Avenue
White Plains, NY 10604
(914) 323-7000
Attn: Peter A. Meisels
Janine Mastellone
Lalit K. Loomba
Allison Holubis

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----	x	Docket No.: 18-CV-3007 (JS) (GRB)
JOSEPH JACKSON,	:	
	:	
Plaintiff,	:	
	:	COUNTY DEFENDANTS'
-against-	:	NOTICE OF MOTION
	:	TO DISMISS PLAINTIFF'S
NASSAU COUNTY; THE INCORPORATED VILLAGE	:	AMENDED COMPLAINT
OF FREEPORT; DETECTIVE ROBERT DEMPSEY;	:	
DETECTIVE GARY ABBONDANDELO; DETECTIVE	:	
JOHN M. HOLLAND; DETECTIVE MICHAEL HERTS;	:	
DETECTIVE MARTIN ALGER; DETECTIVE	:	
ANTHONY SORRENTINO; DETECTIVE DAVID L.	:	
ZIMMER; POLICE OFFICER MELENDEZ;	:	
LIEUTENANT BURDETTE; SERGEANT McHALE;	:	
SERGEANT NOLL; DETECTIVE SHARKEY; POLICE	:	
OFFICER DOWDELL; POLICE OFFICER BARRY	:	
McGOVERN; DETECTIVE TURNER; DETECTIVE	:	
EDWARD HAGGERTY; POLICE OFFICER HALL;	:	
DETECTIVE LAURETTE KEMP; DETECTIVE	:	
WILLIAM TWEEDY; DETECTIVE ANTHONY	:	
KOSIER; DETECTIVE SERGEANT DAN SEVERIN;	:	
DETECTIVE JERL MULLEN; THE ESTATE OF	:	
DETECTIVE JERL MULLEN; JOHN DOE, AS THE	:	
ADMINISTRATOR OF THE ESTATE OF JERL	:	
MULLEN; and JOHN and JANE DOE 1 through 20,	:	
	:	
Defendants.	:	
-----	x	

TO: ELEFTERAKIS, ELEFTERAKIS & PANEK
Attorneys for Plaintiff
80 Pine Street, 38th Floor
New York, NY 10005
(212) 532-1116
gharvis@eeplaw.com

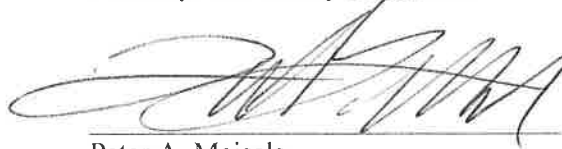
PLEASE TAKE NOTICE, that upon the annexed declaration of Lalit K. Loomba, Esq., dated May 9, 2019; the accompanying memorandum of law dated May 9, 2019; and all the prior proceedings herein, defendants Nassau County, Det. Robert Dempsey, Det. Gary Abbondandolo, Det. John M. Holland, Det. Michael Herts, Det. Martin Alger, Det. Anthony Sorrentino, Sgt. Dennis McHale (s/h/a "Sgt. McHale"), Det. John Sharkey (s/h/a "Det. Sharkey"), Det. James Turner (s/h/a "Det. Turner"); P.O. Kenneth Hall (s/h/a "Police Officer Hall"), Det. Laurette Kemp, Det. William Tweedy and Det. Sgt. Dan Severin (collectively, the "County Defendants"), will move this Court, before the Hon. Joanne Seybert, on June 28, 2019, or on such other date as the Court may determine, for an Order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing certain claims and certain of the individual County Defendants from this action, and for such other further and different relief as the Court, in its discretion, may deem just and proper.

PLEASE TAKE FURTHER NOTICE that according to the briefing schedule set by the Court, opposition must be filed on or before June 7, 2019, and reply papers must be filed on or before June 28, 2019.

Dated: White Plains, New York
May 9, 2019

Respectfully submitted,

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP
Attorneys for County Defendants



Peter A. Meisels
Janine Mastellone
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Our File No. 12473.00014